

THE LAW OFFICES OF  
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ADMITTED IN NEW YORK  
AND NEW JERSEY

January 8, 2020

**Via ECF**

Honorable I. Leo Glasser  
Senior United States District Judge  
United States Courthouse, EDNY  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: US v. Benjamin Bifalco**  
**Ind. No. 19-CR-444 (ILG)**

Dear Judge Glasser:

With the consent of the Government, Mr. Bifalco respectfully requests that his passport be returned to him by Pre-Trial Services on Friday, January 10, 2020 so that he may use it as proper government identification to sit for the LSAT test being administered at a testing location in Brooklyn on Monday, January 13, 2020. The passport will be surrendered to PTS the very next day.<sup>1</sup>

Thank you for your time and consideration.

Very truly yours,  
*Vincent Martinelli*  
Vincent Martinelli

CC: AUSA Elizabeth Geddes and Pre-Trial Services (Via ECF)

<sup>1</sup> I have been informed by Mr. Bifalco that, pending Your Honor's potential approval, PTS has advised Mr. Bifalco of its consent by telephone as his assigned officer is not due back from a leave from work until mid-February.

*Search*  
*In Order*  
*SH Glasser*  
*PTS*  
*1/8/20*

**vincent**

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**From:** Geddes, Elizabeth (USANYE) <Elizabeth.Geddes@usdoj.gov>  
**Sent:** Tuesday, January 07, 2020 10:12 PM  
**To:** vincent  
**Cc:** chijioke\_ezenyilimba@nyept.uscourts.gov  
**Subject:** Re: BiFalco Passport (US v Benjamin BiFalco 1-CR-444)

We have no objection.

Sent from my iPhone

On Jan 7, 2020, at 1:20 PM, vincent <[vjmlaw@si.rr.com](mailto:vjmlaw@si.rr.com)> wrote:

**AUSA Geddes and US PTO Ezenyilimba:**

Mr. Bifalco is scheduled to take an LSAT test on Monday, 1/13/20 at a testing location in Brooklyn and needs to use his passport as Government Identification (he presently does not have a copy of his NYS DL and it will take too long to re-obtain it).

Can Mr. Bifalco have his Passport temporarily back on Friday, 1/10 to be returned by Tuesday, 1/14?

**Mr. Ezenhilimba:**

Does a modification request need to go to Judge Glasser for this?

Regards,

*Vincent Martinelli*

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